

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 15-11

IGOR OVCHINNIKOV, IRINA RZAEVA, and DENIS NEKIPELOV,

— vs. —

**MICHAEL HITRINOV a/k/a
MICHAEL KHITRINOV,
EMPIRE UNITED LINES CO., INC., and CARCONT, LTD.**

INFORMAL DOCKET NO.: 1953(I)

KAIRAT NURGAZINOV,

— vs. —

**MICHAEL HITRINOV a/k/a
MICHAEL KHITRINOV,
EMPIRE UNITED LINES CO., INC., and CARCONT, LTD.**

COMPLAINANTS' STATUS REPORT

Complainants, by their counsel, Marcus A. Nussbaum, Esq. hereby file the following Status Report as required by the Presiding Officer's Initial Order of November 24, 2015 (as amended by Order of May 24, 2016):

1. As of the time of this writing, Complainants' Initial Disclosures have been served; however, Respondents have not fully complied with the Presiding Officer's Order to File Shipping Documents of April 27, 2016. (This issue, along with several other outstanding discovery issues, are currently the subject of Complainants' pending Motion to Strike, Preclude, and/or Compel compliance with the Presiding Officer's Orders).
2. Complainants' preliminary discovery requests and interrogatories shall be served on or before July 15, 2016.

3. Respondents' preliminary discovery requests and interrogatories have yet to have been served; neither have Complainants been provided with a date certain by when such requests and interrogatories shall be served.
4. Complainants have not contacted the Commission's Office of Consumer Affairs and Dispute Resolution Services ("CADRS"), in that due to ensuing motion practice, including the Presiding Officer's Order to Show Cause against Respondents as to why a default judgment should not be entered, joinder of issue only first occurred on May 4, 2016. Shortly thereafter, Respondents filed their instant Motion for Judgment on the Pleadings, thus rendering any contact with CADRS, moot. Accordingly, no agreement was reached between the parties regarding mediation through CADRS.
5. On May 27, 2016, Complainants served Respondents with a Notice to take the Deposition of Respondent, Michael Hitrinov, which was improperly 'rejected' by Respondents' counsel, citing specious technical objections which are also addressed in Complainants' pending Motion to Compel and for other relief.
6. In sum, and as of the time of this writing, discovery herein has been brought to a complete standstill as a result of the laches and dilatory practices of Respondents' counsel, inclusive of having now interposed a Motion for Judgment on the Pleadings which is both premature and entirely frivolous in nature; and which has been interposed solely to vex, annoy, and harass Complainants and their counsel, and to delay timely completion of discovery and expeditious resolution of Complainants' instant claims.

Respectfully submitted,

Dated: June 13, 2016
Brooklyn, New York



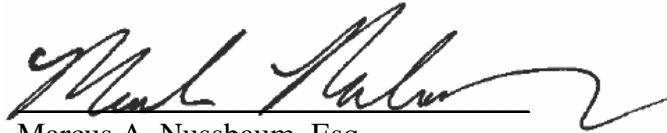
Marcus A. Nussbaum (MN9581)
P.O. Box 245599
Brooklyn, NY 11224
marcus.nussbaum@gmail.com
(888)-426-4370
Attorney for Complainants

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the attached **COMPLAINANTS' STATUS REPORT** upon Respondents' Counsel at the following address:

Nixon Peabody LLP
Attn: Eric C. Jeffrey, Esq.
799 9th Street NW, Suite 500
Washington, DC 20001-4501

by first class mail, postage prepaid, and by email (ejeffrey@nixonpeabody.com).

A handwritten signature in black ink, appearing to read "Marcus A. Nussbaum", written over a horizontal line.

Marcus A. Nussbaum, Esq.
P.O. Box 245599
Brooklyn, NY 11224
Tel: 888-426-4370
Fax: 347-572-0439
Attorney for Complainant
marcus.nussbaum@gmail.com

Dated: June 13, 2016 in Brooklyn, New York.